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BY ELECTRONIC FILING/SERVICE

The Honorable Raymond J. Dearie, U.S.D.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Onewest Bank, N.A. (Plaintiff)
-against-
Nechuma Simon, Aaron Simon, et al. (Defendants)
E.D.N.Y. Case No. 1:14-cv-06622-RJD-VMS

Application For 2 Week Extension Until May 21, 2021 Due To The Death
Of The Father Of The Defendants' Sole Practitioner Attorney

Your Honor:

I am a sole practitioner attorney. As of July 29, 2019, I became the new attorney for the Borrower Defendant Nechuma Simon and the Homeowner Defendant Aaron Simon ("Defendants") in this mortgage foreclosure action. Dkt. 105.

Pursuant to a text order entered on April 5, 2021, Your Honor granted an uncontested application for a 30-day extension of time until May 5, 2021 [Dkt. 125] for Defendants, through me as their sole practitioner attorney, to prepare and file a written submission in response to the "Freedom Mortgage Decision" recently rendered by the New York Court of Appeals on various issues involving the mortgage foreclosure statute of limitations.

My father has recently passed away and, by virtue thereof, I was out of town last week, and I will also not be in my New York office this week. I am Jewish and the time period for sitting shiva is currently ongoing.

Pursuant to the foregoing, I respectfully request that the Court grant me **a 2 week extension until May 21, 2021** to prepare and file the written submission referenced above. I apologize that I have not reached out to ascertain the position of Plaintiff's counsel to an extension as my time has been consumed with my father's recent death.

Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,

/s/

Michael B. Wolk

cc: Counsel of record (by efilng)